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FILED
DISTRICT COURT OF GUAM

JUN 15 2005 *mba*

MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

05-00048

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
DAN ZHU and)
STEVEN SALII,)
)
Defendants.)

CRIMINAL CASE _____

INDICTMENT

ALIEN SMUGGLING

[8 U.S.C. § 1324(a)(2)(B)(ii);
and 18 U.S.C. § 2; and 6 U.S.C.
§§ 251 and 557]

THE GRAND JURY CHARGES:

On or about December 5, 2004, within the District of Guam and elsewhere, the
defendants herein, DAN ZHU and STEVEN SALII, did unlawfully and knowingly bring and
attempt to bring an alien from the Peoples Republic of China, to wit: Yan Qiu, to the United
States, knowing and in reckless disregard of the fact that said alien had not received prior official

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1 authorization to come to, enter, or reside in the United States, in violation of Title 8, United
2 States Code, § 1324(a)(2)(B)(ii), and Title 18, United States Code, § 2, and Title 6, United States
3 Code, §§ 251 and 557.

4 DATED this 15th day of June, 2004.

5 A TRUE BILL.


6 
7 Foreperson

8 LEONARDO M. RAPADAS
9 United States Attorney
10 Districts of Guam and the NMI

11 By: 

12 KARON V. JOHNSON
13 Assistant U.S. Attorney

14 Reviewed:

15 
16 RUSSELL C. STODDARD
17 First Assistant U.S. Attorney